

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH

FILED  
2025 APR 11  
CLERK  
U.S. DISTRICT COURT

GEOFFREY A. THOMAS,  
Plaintiff

**V.**

JEFFERY SHIELDS and  
TEREL SHIELDS,  
Defendants

**Case No. 2:24-MC-00181-RJS-JCB**

**SUPPLEMENT TO MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Defendant Jeffery Shields, appearing as pro se, submits this Supplement to the Motion to Compel Production of Documents previously filed with the Court. This filing updates the Court on the events that occurred following the initial motion and respectfully requests that the Court enforce the production and consider additional relief as appropriate.

## Background and Facts:

1. On April 3, 2025, Plaintiff's counsel confirmed that documents subpoenaed from First Utah Bank and delivered to Plaintiff's counsel on March 12 2025, would be made available to Defendant.
2. Plaintiff's counsel initially directed Defendant to retrieve the documents through ShareFile, a third-party service requiring registration tied to the law firm's account and also allowing Multi Factor Authentication using his cellphone. Defendant expressed reasonable concern about creating an account on an adversary-controlled platform and requested a neutral method of delivery.
3. Plaintiff's counsel pushed back and due to my continued insistence, eventually relented and subsequently sent the documents in .ifs format, which is unreadable using standard software. Defendant made a good-faith effort to access the files but was unable to open them. Consultation with a technical advisor confirmed the format is not accessible without specialized or proprietary software.

4. Defendant had previously requested the documents in a standard format such as PDF, JPG, or ZIP. As of the filing of this supplement, Plaintiff's counsel has not provided the documents in a usable form.
5. Defendant believes this conduct reflects a pattern of obstruction and delay, as multiple requests have been made and ignored, and documents continue to be withheld in practice, despite nominal efforts at production.

### **Request for Relief:**

Defendant respectfully requests that the Court issue an order compelling Plaintiff or Plaintiff's counsel to produce the subpoenaed bank documents in a standard, readable format (e.g., PDF, JPG, or ZIP archive). Defendant further requests that the Court consider sanctions or other appropriate relief under Rule 37 of the Utah Rules of Civil Procedure, due to Plaintiff's failure to provide usable documents and the unnecessary burden placed on Defendant in obtaining discovery.

Respectfully submitted,

Dated : April 11 2025

/s/ Jeffery Shields

Jeffery Shields

Pro Se Judgment Debtor

### **Declaration of Jeffery Shields**

I, Jeffery Shields, declare as follows:

1. I am the Defendant in the above-captioned action and make this declaration in support of my Supplement to Motion to Compel Production of Documents.
2. On April 3, 2025, Plaintiff's counsel confirmed that subpoenaed documents from First Utah Bank would be made available to me.
3. Plaintiff's counsel initially provided access through ShareFile, a third-party platform requiring me to register an account linked to their firm. Due to the adversarial nature of this case, I declined to use that system and requested the documents be provided in a neutral, accessible format.
4. Plaintiff's counsel then sent the records in .ifs format. I was unable to open the files and confirmed with a technical advisor that .ifs is not viewable without specialized proprietary software.
5. I had requested Plaintiff's counsel when i refused to register an account linked to their firm, the documents in a standard format such as PDF, JPG, or ZIP. As of the date of this declaration, I have not received the documents in a format I can access or review.
6. I have made multiple good-faith efforts to obtain access to my own subpoenaed bank records, but Plaintiff's counsel continues to withhold them in practice through nonstandard delivery methods.
- 7.

I declare under penalty of perjury under the laws of the State of Utah that the foregoing is true and correct.

Executed on April 11, 2025, in Salt Lake City, Utah.

/s/ Jeffery Shields  
Jeffery Shields

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was mailed this 11h day of April 2025  
to:

Tanya N. Lewis (12363)  
Tait A. Meskey (17495)  
SNELL & WILMER L.L.P.  
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/s/ Jeffery Shields

Jeffery Shields, Pro Se